ing tribal right of occupancy." In *Fowler* v. *Scott*, 64 Wis. 509, the facts and the decision were identical with those of the principal case. However, the question involved seems to be no more than the construction and meaning of Acts of Congress, and other decisions based upon other treaties or Acts of Congress should hardly be controlling.

INJUNCTION—SALESMAN WORKING FOR COMMISSIONS CANNOT ENJOIN STRIKE OF WORKMEN OF THE COMPANY EMPLOYING HIM.—In a suit to enjoin the striking employees of a buggy company, the plaintiff, a salesman whose sole claim of interest was that of possible interference with his commission due to the closing down of the corporation's business, was *held* not to have sufficient interest to sue without joining the buggy company, and his bill was dismissed. *Davis et al.* v. *Henry* (Circuit Court of Appeals, 1920), 266 Fed. 261.

The chief cases which seem to support the contention that a party with a special interest may maintain an equity suit to enjoin a strike without joining the corporation or company affected practically all involve some recognized property interest. In *Fordney* v. *Carter*, 203 Fed. 454, bond-holders are allowed to maintain such a suit, while in *Ex parte Haggarty*, 124 Fed. 441, and *Jennings* v. *United States*, 264 Fed. 399, the trustees of mortgage bonds maintained suits alone to enjoin strikers injuring the corporation, on the basis of injuries to their own interests. A similar case is that of the stockholder of a corporation who may maintain a suit to protect his own interests in a corporation only when the corporation for some reason is not able or willing to maintain suit itself. In such a case equity will go behind the corporate fiction and recognize that the stockholders are the real parties in interest and will protect their rights. See MARSHALL'S PRIVATE CORPORATIONS, Secs. 299, 303. Hence, in the event that the stockholder exhausts all possibilities in trying to get the corporation or the majority of the stockholders to sue, his equitable interest in the corporate property will be given protection. But the principal case is not a suit based upon an equitable or legal interest in the company's property, but is a mere attempt to protect a possible interest in the profits of the corporation. If such an interest should be protected in equity, this would mean that any employee with a possibility of gain or return from the profits of the corporation might enjoin acts that endangered that possibility. No court seems ever to have gone to that length.

INNKEEPER—LIABILITY FOR PROPERTY NOT LOST THROUGH GUEST'S NEGLIGENCE.—The plaintiff, an experienced traveler, entered the defendant's hotel and lunched there. The rooms were all occupied. In expectation that a room would later be vacated so that he could register, he left his grip near the bellboys' bench in the lobby, without calling anybody's attention to it, though there were present attendants to take charge of baggage and though he knew the location of an easily accessible checkroom in the lobby. Here he could have checked his grip without cost or inconvenience. He then departed from the hotel, remaining away for several hours. The grip was